

**CARGILL
OILSEEDS
PROCESSING**

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September 23, 1999

Dockets Management Branch
(HFA-305)
Food and Drug Administration
Room 1061
5630 Fishers Lane
Rockville, Maryland 20852

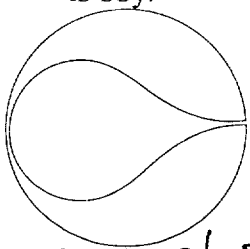
[Docket No. 98P-0638] Food Labelling:
Health Claims; Soy Protein and Coronary
Heart Disease 64 Federal Register 45932,
August 23, 1999

Dear Sir or Madam:

Cargill, Inc. / Protein Products would like to submit a comment in support of the National Food Processors Association (NFPA) comment (attached) in regards to the proposed method for assuring compliance with the health claim on soy protein and coronary heart disease.

Cargill, Inc. / Protein Products, with headquarters in Minneapolis, Minnesota, is a major producer and marketer of soy protein ingredients.

Cargill, Inc. / Protein Products opposes the provision of the proposed regulation (proposed 21 CFR 101.82(c)(2)(ii)(B)) that would create FDA records inspection authority for assuring compliance with the soy protein eligibility criterion for the health claim for products that contain a source of protein other than soy. Like, NFPA, Cargill / Protein Products does not object to the compliance procedure outlined in the same subsection for products whose sole source of protein is soy.



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Like NFPA, Cargill / Protein Products believes that it is reasonable for FDA to develop a final rule that directs food processors to maintain information that substantiates any soy protein - coronary heart disease health claims that they make on a label or in labeling, and to provide such claims substantiation information to FDA upon request. This alternate approach would serve the purpose of providing FDA access to records necessary to determine whether a food containing a protein source(s) in addition to soy is eligible to bear the health claim.

Cargill / Protein Products appreciates the opportunity to be a part of this process through its comment of support to NFPA.

Sincerely,
CARGILL


Mary Thompson
General Manager
PROTEIN PRODUCTS

Encl. National Food Processors Association Comment

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